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Regional Citizens' Advisory Council / "Citizens promoting environmentally safe operation of the Alyeska terminal and associated tankers"

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November 15, 2004

Docket Management Facility
U. S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590-0001

Submitted by FAX to: 202 493-2251

Re: Docket Number: USCG-2004-19106 National Preparedness for Response
Exercise Program (NPREP)

Dear Sir or Madam:

The Prince William Sound Regional Citizens' Advisory Council would like to submit the attached comments to the docket indicated above. If there are any problems in receiving or reading this fax, please contact Ms. Jennifer Fleming at (907) 835 5957.

Sincerely,

John S. Devens, Ph.D.
Executive Director

Cc: CDR Mark Swanson, US Coast Guard MSO Valdez
Bill Hutnacher, ADEC
Capt. Tom Colby, Prince William Sound RPG
Rod Hoffman, Alyeska/SERVS
Richard Ranger, Alyeska

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Prince William Sound Regional Citizens' Advisory Council (PWSRCAC)
3709 Spenard Road
Anchorage, AK 99503
(907) 277-7222 or 1 800 478-7221

**Comments on the NPREP Triennial Exercise Schedule for 2005, 2006, and 2007,
and NPREP Guidelines**

November 15, 2004

Submitted for Docket Number USCG 2004-19106 -4/

The Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) is an independent non-profit corporation whose mission is to promote the environmentally safe operation of the Valdez Marine Terminal and associated tankers. Our work is guided by the Oil Pollution Act of 1990 and our contract with Alyeska Pipeline Service Company. PWSRCAC's 18 member organizations are communities in the region affected by the 1989 Exxon Valdez oil spill, as well as commercial fishing, aquaculture, Native, recreation, tourism and environmental groups.

The plan holders who operate in our region participate in the National Preparedness for Response Exercise Program (NPREP) as a means of satisfying the requirement for a response exercise program under the Oil Pollution Act of 1990 (OPA 90). The NPREP guidelines serve as the most frequent program for exercise planning, development and evaluation. PWSRCAC is highly interested in all efforts to monitor the effectiveness of NPREP in meeting the intent of OPA 90 and is pleased to submit the following comments on the NPREP Triennial Exercise Schedule for 2005, 2006, and 2007, and NPREP Guidelines.

In the summer of 2004, in accordance with the NPREP schedule, the Prince William Sound Area Exercise was conducted as a jointly held drill with the US Coast Guard joining with industry partners ConocoPhillips. This was an excellent example of a team approach to planning and conducting a large scale NPREP drill and PWSRCAC recommends efforts be made to continue this kind of partnership in all Area Exercises.

PWSRCAC relies on the NPREP guidelines to schedule drills and exercises in our region and would like to take this opportunity to comment on the NPREP program in general. PWSRCAC submitted comments on the July 2001 Draft Revisions to the NPREP Guidelines, (submitted to Docket USCG 2000-7514). PWSRCAC would like to again bring to focus on the following issues:

- A. Credit for Exercises - Lessons Learned
- B. Unannounced Drills
- C. Protection Techniques.

The comments submitted in 2001 concerning Lessons Learned were:

A. Credit for Exercises - Lessons Learned

One of our comments at the last NPREP Workshop was that we would like to see verification that lessons learned had been incorporated into a response plan prior to the plan holder taking credit for the exercise. The changes to most of the documentation procedures and forms in Appendix A include the additional requirement for the plan holder to provide "...procedures and schedules for implementing lessons learned..." as part of the self-certification documentation. We think this is a good step and makes it more likely that lessons learned will be incorporated into response operations. We still would like to see the lessons-learned schedule completed before credit is taken, however. The Internal Exercise Documentation form for Notification Exercises is missing a space for including the lessons-learned schedule, although most other documentation forms in Appendix A have the space provided.

In 2004, PWSRCAC still very much believe that lessons learned together with participant training, are extremely important parts of drills and exercises. As responders leave organizations it is vital to assimilate lessons learned into organizations to avoid continually learning the same lessons over and over again. PWSRCAC still requests that verification of lessons learned be incorporated into response plans prior to plan holders taking credit for the drill or exercise.

The comments submitted concerning Unannounced Exercises and Credit for Exercises in 2001 were:

B. Unannounced Exercises and Credit for Exercises

Another comment we made in August 2000 proposed increased government initiated unannounced drills with no advance notice to plan holders. The revision to the NPREP guidelines that we support related to this comment is requiring that a plan holder subject to a government initiated unannounced drill must "successfully complete" (p. 2-14) the objectives of the drill rather than simply "participate in" the drill. The definition of "successfully complete" is not clear, but it is still better criteria for exemption from another government-initiated drill for 36 months.

PWSRCAC has observed over the past year in our region that unannounced drills and exercises are the most effective and productive forms of responder training and we urge an increase in the number of unannounced government initiated drills.

Comments submitted concerning Protection Techniques in 2001 were:

C. Protection Techniques

In reference to the Response Plan Core Components (Appendix B), we do not support relocating dispersant, in situ burning and bioremediation strategies to the Section #7, Recovery component. These alternative techniques were formerly located under 8, Protection component and we believe they more properly belong there. As part of the Recovery component, these three technologies are identified

as viable means of recovering, mitigating and removing spilled oil from the environment. While these strategies have a place in oil spill response, they are not effective techniques for recovering spilled oil from the environment.

As in 2001, PWSRCAC does not consider dispersant use, in-situ burning or bioremediation strategies techniques for recovering spilled oil from the environment. There is nothing about these strategies that involve any recovery of spilled oil.

PWSRCAC recognizes that personnel changes happen within all entities involved in oil spill response and would therefore welcome a hands-on workshop be held reviewing the NPREP guidelines and also focusing on potential future changes to the NPREP.

PWSRCAC always welcome the opportunity to comment on the NPREP Guidelines and the 2004 Area Exercise held in Prince William Sound shows the importance of the NPREP in keeping the level of preparedness high in our region.